



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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January 5, 2015

Mark Franco, EHS Manager  
Trelleborg Coated Systems US Inc  
213 Central St  
Milford, Massachusetts 01757

**RE:** Milford  
Transmittal No.: X264111  
Application No.: CE-14-033  
Class: SM80-7  
FMF No.: 131065  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Franco:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your AQ 34, Administrative Amendment ("Application") listed above for its active Air Quality Plan Approval W052497 amended on April 20, 2007. This Application concerns the change of ownership for the facility located 213 Central Street in Milford, Massachusetts ("Facility"). The change is from Archer Rubber LLC to Trelleborg Coated Systems US Inc, d/b/a Archer Rubber.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

AIR QUALITY PLAN APPROVAL

Tr# X264111

Trelleborg Coated Systems US Inc  
Milford, MASSACHUSETTS

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**I. HISTORY**

- A. The facility began operating at the Central Street location prior to 1972. The facility produces rubber coated fabrics using non-solvent and solvent-based application techniques.
- B. On October 30, 1992, the facility received Plan Approval No. C-P-91-029 to install enclosures and a thermal oxidizer, in order to control emissions from the existing solvent-based coating lines. A stack test was performed on December 29, 1993 and January 13, 1994 to determine the efficiency of the thermal oxidizer. Results indicated that the oxidizer achieved a capture efficiency of 99.3% from the spreader machines and a destruction efficiency of 96.0%. The test was conducted with a temporary total enclosure on one spreader, to determine capture efficiency, and up to eight spreader machines in operation. At this time none of the churn room mixers were ducted to the oxidizer.
- C. On September 11, 2000 the Department issued Operating Permit Tr.# 100735 to the facility.
- D. Performance testing conducted on the oxidizer in 2005 indicated that the emission unit did not achieve the required destruction efficiency. The oxidizer minimum operating temperature was increased to 1575°F. Testing in September 2006 confirmed that the oxidizer could achieve a destruction efficiency of 99.7% at this temperature.

**II. PROJECT DESCRIPTION**

- A. The approved project consists of the operation of existing fabric coating equipment and associated equipment. Specifically, the equipment includes the operation of twelve (12) spreader machines, three (3)

calendars and associated storage and mixing equipment, as described in Attachment A, and a thermal oxidizer to control captured VOC/HAP emissions.

B. Spreader Machines - The existing twelve spreader machines are used to apply solvent-born rubber onto a fabric substrate. Each coating machine operates independently. The type of rubber applied varies and includes hypalon, neoprene, butyl and others. Currently, the rubber is applied in a liquid state with the solvents toluene or methyl ethyl ketone as a carrier. Alternative carriers are being evaluated to reduce the facility's HAP emissions. The coated fabric passes through the drying section of the coating machines, i.e. the oven, which is heated by steam coils, causing the solvent to evaporate. Each coating machine is contained within a Permanent Total Enclosure, which is designed to capture approximately 100% of vapors. 1994 stack testing indicated a capture efficiency of 99.3%. The exhausts from each enclosure are ducted together and vent to the thermal oxidizer.

C. The maximum coating application rate for each machine is dependent upon fabric (web) speed, fabric width and coating application thickness. The spreader machine speeds vary from 11 yards per minute (ypm) to 54 ypm. The fabric width varies by product, but cannot exceed 67 inches due to equipment limitations. Coating thickness varies by product. The maximum documented coating thickness is 1 ounce per square yard of fabric. To ensure quality control, the amount of solids per square foot of fabric is monitored for every production run. The fabric may be coated on both sides, but requires an additional pass through the machine.

D. Calendars - The existing three calendars are used to apply non-solvent-born rubber onto a fabric substrate. Each machine operates independently. The type of rubber applied varies and includes hypalon, neoprene, butyl and others. The rubber is applied in a semi-solid state without the use of a solvent carrier. The manual application of talc, to prevent sticking, causes particulate emissions. Each machine is ducted to a fabric filter, which vents indoors.

E. Solvent storage tanks - The existing two solvent storage tanks are used to store toluene. Methyl ethyl ketone is also used, but is delivered in 55-gallon drums. The storage tanks are located indoors, on an impermeable surface and have secondary containment. A vapor balance system is used during filling.

F. Mixing Equipment - The existing mixing equipment includes twenty churn tanks and five barrel mixers. The churn tanks are stationary mixing tanks with attached impellers and lids. The barrel mixers are portable impellers with lids which attach to 55-gal or 30-gal drums. Solvent is hard-piped from the solvent storage tanks or the MEK drums to each churn as required by the product recipe. Rubber is manually added to the churn, then the lid is closed. The mixture is agitated via a central impeller shaft until the rubber is dissolved, usually for 5 to 8 hours depending on the rubber compound. During mixing, in the churns and with the barrel mixers, lids cover the vessel. Each lid has a vent which exhausts to the oxidizer.

G. Cleaning - Toluene is used to manually clean the churns, barrel mixers and knife spreaders. Spent solvent is stored for reuse in the churn room. In the future, the facility may distill and reuse solvent.

H. Thermal Oxidizer - The thermal oxidizer is a REECO Model VFC rated at 20,000 scfm and is natural gas fired with a maximum heat rate input of 13.85 million BTU/hr. The oxidizer is regenerative and is fitted with heat recovery media. The oxidizer is designed to treat a maximum of 700 lb VOC/hr and will achieve a destruction efficiency of at least 98% when operated at the minimum temperature of 1575F. Past stack testing, which has occurred at differing oxidizer combustion set points, has indicated

destruction efficiencies of 96% (1994, combustion temp = 1500°F), 99.5% (1997, combustion temp = 1500°F) and 99.7% (2006, combustion temp = 1575°F).

### III. EMISSION UNIT IDENTIFICATION

The Permittee shall operate the fabric coating equipment and associated storage and mixing equipment in accordance with the specifications noted in Table I.

Table I				
Emission Unit	Description of Emission unit	Manufacturer and Model Number	Design Capacity	Pollution Control Device(s)
EU #1	Twelve spreaders	custom	Speed: 11 – 54 ypm width: to 67 inch wide Coating: 1 oz/sq yard	Thermal oxidizer
EU #2	Three calendars	Adamson, Birmingham, and Birmingham	N/A	Fabric filters
EU #3	Two Raw Material Storage tanks – toluene	N/A	One at 1700 gallons One at 1350 gallons	Submerged fill, vapor balance & covered tanks
EU #4	Mixing Room (Churn Room)	Sherman, or equivalent Lightnin, or equivalent	20 churns @ 200 gallons each 5 barrel mixers	Thermal oxidizer
EU #5	Cleaning	N/A	manual	None

ypm = yards per minute

### IV. EMISSIONS

A. The application of rubber to fabric will result in fugitive emissions to the ambient air of Particulate Matter (PM), Hazardous Air Pollutants (HAPs), and Volatile Organic Compounds (VOC's). PM will result from the application of talc to the finished product at the calendar machines. HAP and VOC emissions will result from fugitive losses at the spreaders, churns, mixers, from cleaning activities and non-combusted emissions from the oxidizer.

B. The application of rubber to fabric will result in emissions to the ambient air of Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC's) from combustion in the thermal oxidizer. Particulate Matter (PM) and Sulfur Dioxide (SO<sub>2</sub>) emissions will be negligible since the oxidizer is natural gas fired.

### V. EMISSION LIMITS AND RESTRICTIONS

A. The maximum emissions (worst case) will occur when all spreaders, churns and barrel mixers are in operation. However, since the thermal oxidizer was designed with a maximum inlet of 700 lb VOC/hr,

this becomes the worst case and reduces the operation of the spreader machines. The Permittee shall comply with the emission limits and restrictions presented in Table II.

Table II				
Emission Unit	Fuel	Pollutant	Emission Limit/Standard	Restrictions
EU # 1 (spreaders)	N/A	VOC/HAP	See below.	Minimum 99% capture.
EU # 2 (calendars)	N/A	PM	less than one ton per year	
EU # 3 (storage tanks)	N/A	VOC/HAP	less than one ton per year	See Special Conditions.
EU#1 & EU#4  (spreaders and mixing room)	N/A	HAP	< 700 lb/hr inlet to oxidizer < 504 lb/day < 9.5 tpy single HAP < 24.5 tpy total HAPs	Minimum 98% destruction for VOC and HAP.  Residence time $\geq$ 1.6 sec.  Operating temp. $\geq$ 1575°F.
		VOC	< 700 lb/hr inlet to oxidizer < 504 lb/day; < 47 tpy	
		PM	Negligible	
		SO <sub>2</sub>	Negligible	
		NO <sub>x</sub>	< 5.9 tpy	
		CO	< 4.9 tpy	
		Visible Emissions		Zero percent opacity.
EU # 5 (cleaning)	N/A	VOC/HAP	less than one ton per year fugitive emissions	
Facility-wide	N/A	HAP	< 9.5 tpy single HAP < 24.5 tpy total HAP	
		VOC	< 49 tpy	
		PM	less than one ton per year	

VOC = Volatile Organic Compound  
HAP = Hazardous Air Pollutant  
NO<sub>x</sub> = Nitrogen Oxides (NO<sub>2</sub> & N<sub>2</sub>O)

PM = Particulate Matter  
CO = Carbon Monoxide  
SO<sub>2</sub> = Sulfur Dioxide

## VI. EMISSION TOTALS

A. The Permittee, operating the fabric coating equipment in accordance with the restrictions contained in this approval letter, shall not exceed the total tons per year presented in Table III.

Table III					
Emission Unit	Pollutant (tpy)				
	PM	NO <sub>x</sub>	CO	HAP	VOC

<b>Table III</b>					
<b>Emission Unit</b>	<b>Pollutant (tpy)</b>				
EU# 1 & 4	N/A	< 5.9	< 4.9	< 9.5 single < 24.5 total	< 47
EU# 2	< 1	N/A	N/A	N/A	N/A
EU# 3	N/A	N/A	N/A	< 1	< 1
EU# 5	N/A	N/A	N/A	< 1	< 1
Total Facility Wide Emissions	< 1	< 5.9	< 4.9	9.5 single 24.5 total	49 tpy

## VII. SPECIAL CONDITIONS

A. Plan Approval Tr# W052497, issued on January 1, 2005 and amended on April 20, 2007, completely superseded Plan Approval C-P-91-029, Transmittal Number 24159, issued on October 30, 1992 and amended November 27, 1992. This Plan Approval Tr# X264111 supersedes W052497.

B. Emission Unit No. 1 (Spreaders)

- 1) The emissions from EU #1 shall be exhausted to the thermal oxidizer.
- 2) The Permittee shall ensure that approximately 100% of vapors from the spreader machines are captured and ducted to the thermal oxidizer by maintaining Permanent Total Enclosures (PTE) around each coating line.

C. Emission Unit No. 2 (calendars)

- 1) The emissions from EU #2 shall not be emitted to the ambient air. The calendar machines shall be ducted to properly designed and operated fabric filters, to minimize fugitive dust emissions. The fabric filters shall exhaust indoors.
- 2) During the application of anti-stick agents (typically talc) the fabric filters shall be operational, at all times.
- 3) Cleanup of anti-stick agents (typically talc) shall be performed using a HEPA vacuum.
- 4) The fabric filters shall be inspected, maintained and operated in accordance with manufacturer's recommendations.

D. Emission Unit No. 3 (tanks)

- 1) The emissions from EU #3 shall be minimized through the following:

- a. All pressure relief valves shall be operated to minimize emissions and set in accordance with manufacturer's recommended setting,
- b. All loading of chemicals to the storage tanks shall be performed using a vapor balancing system.
- c. The tanks shall be protected from the elements, i.e. covered.

2) The total solvent throughput shall be determined from a flow meter or using purchase records.

E. Emission Unit No. 4 (mixing room tanks)

- 1) The emissions from EU #4 shall be exhausted to the thermal oxidizer.
- 2) To minimize fugitive emissions, all mixing vessels (churn tanks and barrels) shall be covered during mixing operations. All vessels shall be covered except during rubber loading. The covers shall vent to the thermal oxidizer whenever mixing operations occur.
- 3) Solvent shall be added to the churn tanks via hard-piping. No manual additions of solvent shall occur.

F. Emission Unit No. 5 (cleaning)

- 1) The emissions from EU #5 shall be partially emitted to the ambient air as fugitive emissions and combusted in the thermal oxidizer.
- 2) Within 60 days of the date of this approval, a Standard Operating Procedure (SOP) shall be developed and submitted to the Department detailing the steps used to clean spreaders, mixing tanks, impeller blades and other equipment.
- 3) A study of cleaning solvent use and losses shall be performed to evaluate methods to accurately determine fugitive emissions and to determine a feasible method of tracking the amount of cleaning solvent used and emitted. Documentation shall be maintained to support that emissions are less than one ton per year, including records for reclaimed solvent, reused solvent or solvent shipped off-site as waste.
- 4) Within 60-days of permit issuance, the Permittee shall submit a plan to the Department to track cleaning solvent usage and to determine emission rates.

G. Emission Unit Nos. 1 & 4

- 1) The emissions from EU #1 and EU #4 shall be emitted to the ambient air through an existing steel stack servicing the thermal oxidizer.
- 2) The exhaust from the oxidizer stack shall meet the following criteria:
  - a. stack exit discharge shall be vertically upwards,
  - b. stack exit velocity shall be 40 feet per second or greater,
  - c. stack height shall be, at least, 10 feet above the highest adjacent roof,
  - d. any rain protection shall not restrict the vertical exhaust flow, and

- e. exhaust shall have zero percent opacity.

#### **Facility-Wide**

H. When calculating emissions of VOC and HAP, reductions may be taken for waste shipped off-site, provided that the following are maintained:

- 1) A record of the amount (in pounds or gallons) shipped on an appropriately documented manifest is maintained; AND
- 2) A record of the concentration and type of waste in the shipment is maintained. Since waste may contain dirt, water and other impurities, the amount of VOC, and/or HAP in the shipped waste must be documented, especially in the case of mixed wastes. If three consecutive tests indicate that a waste stream has a relatively constant composition (less than 5%, by weight, variation), then an average may be used without testing of every shipment, until facility operations change such that the composition of the waste stream will change.

I. Good housekeeping measures and work practice procedures will be employed at the facility, including but not limited to:

- 1) Storing wipe rags and clean-up rags in closed containers.
- 2) Conducting all cleanup operations in a manner to minimize emissions of VOC.
- 3) Training employees appropriately in hazardous chemicals handling procedures, safety and spill response.
- 4) Maintaining an MSDS book, for all handled chemicals, available and readily accessible in the manufacturing area.
- 5) Maintaining appropriate Personal Protective Equipment in a readily available location.
- 6) Maintaining non-sparking tools for work in areas with flammable chemicals.

J. In accordance with 310 CMR 7.18 (1), the Permittee shall, at all times, store and dispose of VOC containing materials in a manner which will minimize VOC evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall include incineration in an incinerator approved by the Department, transfer to another person licensed by the Department to handle VOC, or any other equivalent method approved by the Department.

#### **VIII. MONITORING & TESTING REQUIREMENTS**

A. Monitoring equipment or emission monitoring systems installed for the purpose of documenting compliance with this APPROVAL shall be installed, calibrated, maintained and operated by the Permittee in sufficient manner to ensure continuous and accurate operations at all times.

B. Recording Devices – The Permittee shall maintain recording devices in an accurate operating condition. The Permittee shall continuously monitor and record the operating temperature of the thermal oxidizer, utilizing a thermocouple, or equivalent device, and a chart recorder, or equivalent device. The



thermocouple shall be tested/calibrated or replaced at least once per year. All calibrations shall be certified as performed in accordance with the appropriate ASTM Test Method. The continuous chart recorder shall be checked, dated and initialed daily by an employee of the facility. Temperatures that drop below the minimum required combustion temperature shall be noted on the chart.

C. Compliance with the allowable opacity limits shall be determined in accordance with EPA method 9, as specified in 40 CFR 60, Appendix A.

D. In accordance with 310 CMR 7.13, the Department may require testing for any pollutants if deemed necessary to ascertain the mass emission rates and relationship to equipment design and operation. The Permittee shall conduct stack testing when the Department has determined that such stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisions. Such stack testing shall be:

- 1) conducted by a person knowledgeable in stack testing, and
- 2) conducted in accordance with procedures contained in a test protocol which has been approved by the Department, and
- 3) in the presence of a representative of the Department when such is deemed necessary in accordance with 310 CMR 7.13(1).
- 4) Emission testing to demonstrate compliance with emission limits specified in Table 3 shall be in accordance with EPA approved reference test methods unless otherwise approved by EPA and the Department or unless otherwise specified.

E. The Permittee shall monitor the operations of the entire facility such that necessary information is available for the preparation of the Source Registration/Emission Statement forms as required by 310 CMR 7.12.

## **IX. RECORD KEEPING REQUIREMENTS**

A. A record-keeping system shall be established and continued on site by the Permittee. All records shall be maintained up-to-date such that twelve-month rolling period information is readily available for Department examination. The Permittee shall maintain the following records on site for a period of five (5) years. Record keeping shall, at a minimum, include:

- 1) Compliance records sufficient to demonstrate that emissions have not exceeded what is allowed by this approval. Such records may include daily production records, raw material usage rates, fuel purchase receipts, emissions test results, monitoring equipment data and reports.
- 2) Maintenance: A record of routine maintenance activities performed on emission unit, control equipment and monitoring equipment including, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
- 3) Malfunctions: A record of all malfunctions on emission unit, control equipment and monitoring equipment including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions

were initiated; and the date and time corrective actions were completed and the emission unit returned to compliance.

4) The Permittee shall monitor the throughput of chemicals in the storage tanks (solvent: toluene) and calculate the associated VOC/HAP emissions on a monthly and 12-month rolling basis. Throughput may be determined using purchase records or logs/meter readings.

5) The Permittee shall monitor the throughput of chemicals used in drums (solvent: MEK) and calculate the associated VOC/HAP emissions on a monthly and 12-month rolling basis. Throughput may be determined using purchase records or log books.

6) The Permittee shall monitor the amount of solvent used for cleaning and calculate the associated VOC/HAP emissions on a monthly and 12-month rolling basis. Unless test data show otherwise, the Permittee shall assume that 95% of cleaning solvent used, which excludes the amount recycled, is captured and combusted by the thermal oxidizer. The amount of cleaning solvent used is the total solvent not used in rubber production minus the amount recycled, then multiplied by the assumed capture rate of 95%. The amount of cleaning solvent not used in rubber production may be determined by logs or by mass balance, e.g. amount of solvent dispensed minus the amount of solvent used in the churn room for the period.

7) Churn cards for every batch produced.

8) Job cards and the specification for every batch run.

9) Waste manifests, waste characterizations and/or recycling data.

B. Records of emissions testing conducted to demonstrate compliance with the applicable requirements in Table 2 shall be in accordance with 310 CMR 7.13(1)(d).

C. The Permittee shall maintain sufficient records of its operations and monitoring information for the preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.

D. The Permittee shall keep copies of the Source Registration/Emission Statement Forms submitted to the Department for five (5) years as required per 310 CMR 7.12(3)(b).

E. *APPROVAL LETTER* - Pursuant to the authority granted to the Department at 310 CMR 7.02(7), the facility shall maintain a copy of this approval, and any subsequent modifications of this approval, on-site for as long as the approval is valid. In accordance with 310 CMR 7.02(3)(l), the approval is valid until one of the following conditions occur: the equipment is dismantled or removed from the facility, the facility notifies the Department that the approval is no longer valid, the equipment is substantially reconstructed or altered and subject to 310 CMR 7.02, the approval is superseded by another approval, or the Department revokes the approval in accordance with 310 CMR 7.02(3)(k).

F. *OPERATING AND MAINTENANCE PROCEDURES* - The facility shall maintain a copy of the approved Standard Operating Procedure (SOP) and Standard Maintenance Procedure (SMP) on-site for as long as this approval is valid. Updates or revisions to the SOP and SMP shall be submitted for Department approval prior to initiating the modification(s).

## **X. REPORTING REQUIREMENTS**

- A. The Permittee shall notify the Department as soon as reasonably practical by telephone or fax after the occurrence of any upsets or malfunctions (i.e., any piece of equipment or device breakdown that causes an excess emission) and in writing within two (2) business days of such event.
- B. The Permittee shall summarize and submit to the Department the results of stack testing as prescribed in the Department's approved pretest protocol, stack testing that was determined by the Department to be necessary to ascertain compliance with the Department's regulations or design approval provisions in accordance with 310 CMR 7.13(1) and 310 CMR 7.13(2).
- C. The Permittee shall summarize and submit to the Department the results of the cleaning chemical usage and emissions study.
- D. Upon the Department's request, any records required by the applicable requirements identified in this permit, or the emissions of any air contaminant from the facility, shall be submitted to the Department within 30 days of the request by the Department, or within a longer time period if approved in writing by the Department. Said response shall be transmitted on paper, on computer disk, or electronically at the discretion of the Department.
- E. All required reports must be certified by a responsible official of the Permittee as provided in 310 CMR 7.01(2)(c).
- F. The Permittee shall submit a Source Registration/Emission Statement form to the Department on an annual basis as required by 310 CMR 7.12(2).
- G. In accordance with 310 CMR 7.12(3), the facility shall register on a form obtained from the Department such information as the Department may specify including:
- 1) A description of the facility, including a description of process and combustion equipment, a description of facility operating hours and operating schedule, a description of all raw materials and fuels used at the facility.
  - 2) Detailed emissions estimates for all criteria and hazardous air pollutants emitted from the facility.
  - 3) An emission statement summarizing and certifying actual annual emissions and peak ozone season day emissions of VOC and oxides of nitrogen.
  - 4) A description of air pollution control equipment, including control efficiencies.
  - 5) Calculations and assumptions used to support emissions such as annual fuel process rate and peak ozone season daily process rate.
  - 6) Information required by 310 CMR 7.12(3) shall be submitted annually pursuant to 310 CMR 7.12(2).

## **XI. GENERAL CONDITIONS**

- A. OPERATION - No person shall operate this facility except in conformance with the requirements established in this Approval.

- B. **SUSPENSION, MODIFICATION, AMENDMENT OR REVOCATION** – This approval may be suspended, modified, amended or revoked by the Department if, at any time, the Department determines that the facility is violating any condition or part of this approval. This approval may be modified or amended when in the opinion of the Department a modification or amendment is necessary or appropriate to clarify the approval conditions or after consideration of a written request by the Permittee to amend the approval conditions. Any relaxation of an emission limit or a specific condition noted in this approval that would result in an increase in emission rates as established in this approval must be made in accordance with 310 CMR 7.02.
- C. **OTHER REGULATIONS** - This approval does not negate the responsibility of the owner/operator to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with any other applicable federal, state or local regulation now or in the future.
- D. **EXISTING APPROVALS** - All plan approvals issued under 310 CMR 7.02(4) or 310 CMR 7.02(5), or, citation prior to August 3, 2001, 310 CMR 7.02(2) prior to the effective date of this Approval shall continue to be in effect. The facility shall meet the emission rates and approved conditions specified in the applicable plan approval(s) unless specifically altered by this Approval.
- E. **VISIBLE EMISSIONS** - The facility shall be operated in a manner to prevent the occurrence of visible emissions that cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.06.
- F. **DUST AND ODOR** - The facility shall be operated in a manner to prevent the occurrence of dust or odor conditions which cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.09.
- G. **NOISE** - The Permittee shall ensure that noise levels during routine operations, including start ups and shut downs, shall not exceed the Department Noise Policy 90-001 and in no case shall cause a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.10.
- H. **ASBESTOS** – Should asbestos remediation/removal be required as a result of this Approval, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15.
- I. **REMOVAL OF AIR POLLUTION CONTROL EQUIPMENT** - Notwithstanding 310 CMR 7.02(2)(b)2., no person shall cause, suffer, allow, or permit the removal, alteration or shall otherwise render inoperative any air pollution control equipment or equipment used to monitor emissions which has been installed as a requirement of 310 CMR 7.00, other than for reasonable maintenance periods or unexpected and unavoidable failure of the equipment, provided that the Department has been notified of such failure, or in accordance with specific written approval of the Department.
- J. **COMPLIANCE ASSURANCE FEE** – Pursuant to 310 CMR 4.03, an annual fee, based on the Commonwealth's fiscal year, will be charged to your facility to cover the cost of compliance activities performed by the Department, including registrations, report reviews, inspections, source registration reviews, etc. No fee shall be charged in the fiscal year that the permit is issued. If multiple air quality permits exist for a facility, the facility shall pay the single highest applicable fee. This fee does not include stack test fees.

LIST OF PERTINENT INFORMATION, TRANSMITTAL # W052497

Name of Facility: Trelleborg Coated Systems US Inc Rubber Company

Location: 213 Central Street, Milford, Massachusetts

- Non-Major Comprehensive Plan Application, dated June 30, 2004
- Amendment requests of January 22, 2007 and December 18, 2014

Enclosed is a stamped approved copy of the December 18, 2014 submittal.

Should you have any questions concerning this Plan Approval, please contact Kim McCoy by telephone at 508-767-2770, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

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Roseanna E. Stanley  
Permit Chief  
Bureau of Waste Prevention

Enclosures

ecc: Milford Board of Health  
Milford Fire Department  
MassDEP/Boston - Yi Tian

## Attachment A- Equipment Schedule

### **Unit: Spreader Machine #1 - 12**

Manufacturer	Custom
Type	attached oven is a permanent total enclosure
Feed/Raw Materials	fabric and rubber-solvent mix
Heat source	steam
Capacity	67 inch wide web, web speed (see below), variable coating application rate

<b>Machine</b>	<b>Max Speed (vpm)</b>
1	42
2	42
3	14
4	43
5	30
6	28
7	13
8	22
9	54
10	54
11	11
12	22

Monitoring Equipment	none
Stack Parameters	vents to Thermal Oxidizer

### **Unit: Calendars #1, #2 and #3**

Manufacturer	(#1) Adamson and (#2 and #3) Birmingham
Type	steam heated roll
Feed/Raw Materials	rubber and solid additives
Monitoring Equipment	None
Stack Parameters	vents indoors after fabric filter

### **Unit: Churn Tanks #1-20**

Manufacturer	Sherman (New Haven, CT), or equivalent
Model No.	004-1199, or equivalent
Type	stationary mix tank with fixed impeller and vented lid
Solvent/Feed	solvent and milled rubber
Capacity	200 gallons solvent and rubber
Monitoring Equipment	none
Stack Parameters	vents to Thermal Oxidizer

### **Unit: Barrel Mixers #1-5**

Manufacturer	* Various *
Type	portable mixer with vented lid
Solvent/Feed	rubber and solvent (currently toluene or MEK)
Capacity	55-gallon or 30-gallon drums
Monitoring Equipment	None
Stack Parameters	vents to thermal oxidizer

- \* #1 Lightnin mixer model ND 4B, serial no. 6611340.
- #2 Lightnin mixer model ND 4B, serial no. 637482.
- #3 Lightnin mixer model ND 4B, or equivalent
- #4 Lightnin dura-mix.
- #5 Lightnin Rochester, NY model 1403.

**Unit: Thermal Oxidizer**

Manufacturer	REECO
Model No.	VFC – 20,000
Type	regenerative, natural gas fired
Install date	1992
Feed	spreader ovens, churns, and mixers.
Max. Inlet Gas Flow Rate	20,000 scfm
Max. heat input rate	13.85 million BTU/hr
Minimum VOC Removal Efficiency	98.0%
Monitoring Equipment	differential pressure gauge & combustion chamber temp. Low temp alarm and high temp alarm LEL monitor in inlet duct
Maximum Pressure Drop	1.0 in. water gauge
Minimum Combustion Temperature	1575°F
Stack ID No.	1
Stack Height	35 feet above grade, 10 ft above roof
Stack Inside Exit Diameter	45 inches